

April 14, 2015

Honorable Kiyo A. Matsumoto  
United States District Judge  
United States Courthouse  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: Zilberman v. Redbumper LLC, 1:14-cv-06091-KAM-SMG (E.D.N.Y.)**

Dear Judge Matsumoto,

Plaintiff Victor Zilberman ("Plaintiff") and Defendant Redbumper LLC ("Defendant") hereby submit this joint letter in accordance with the Court's April 7, 2015 Minute Order.

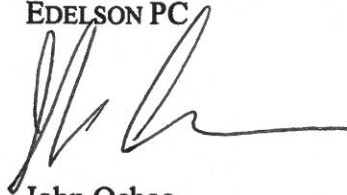
The Plaintiff reports that he has completed jurisdictional discovery and reviewed the deposition transcript of RedBumper's Rule 30(b)(6) corporate designee. Plaintiff believes that the discovery obtained shows that a different company, CarOffer LLC ("CarOffer") was directly involved in the making of the prerecorded calls at issue to the Plaintiff, who is a citizen of New York, that Plaintiff alleges violated the Telephone Consumer Protection Act ("TCPA"), 47 U.S.C. § 227. Plaintiff also believes the evidence adduced shows that Pearl Technology Holdings LLC ("Pearl"), CarOffer's parent company, was so closely involved with CarOffer as to render it the alter-ego of CarOffer, or, alternatively, that the two companies were in a principal-agent relationship. Plaintiff believes this close relationship will make Pearl liable for the TCPA violations at issue, as well as render Pearl subject to personal jurisdiction in this Court.

Based upon this information, he intends to file an amended complaint pursuant to Rule 15(a)(1)(B) for the purpose of dismissing Defendant Redbumper and adding CarOffer and Pearl as party-defendants. Plaintiff intends to file his amended complaint within fourteen (14) days, on or before April 28, 2015.

Defendant RedBumper agrees to its dismissal from this lawsuit. But for Plaintiff's representations to dismiss RedBumper, RedBumper would be prepared to file its Motion to Dismiss. RedBumper takes no position as to the propriety of Plaintiff's decision to add CarOffer and Pearl as party-defendants.

Respectfully submitted,

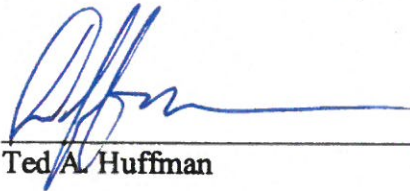
EDELSON PC

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John Ochoa

AGREED:

MUNCK WILSON MANDALA, LLP

A handwritten signature in blue ink, appearing to be 'Ted A. Huffman', with a long horizontal stroke extending to the right.

Ted A. Huffman